**PRIVACY POLICY**

Sarabel Enterprises Ltd. (“**Sarabel Enterprises**”, “**we**”, “**us**” or “**our**”) wants you to be familiar with our privacy practices. This Privacy Policy (“**Policy**”) applies to personal information we collect when you visit our website/online store (“**Site**”), purchase our products through our Site (“**Products**”), and otherwise interact with us. This Policy outlines how we collect, use, transfer, and disclose your personal information and was designed based on the guiding principles of Canada’s *Personal Information Protection and Electronic Documents Act* (“**PIPEDA**”) and substantially similar provincial legislation.

**By visiting our Site, purchasing our Products, or otherwise interacting with us, you consent to the collection, use, transfer, and disclosure of your personal information by Sarabel Enterprises in accordance with the terms of and for the purposes set out in this Policy, as they may be amended from time to time.**

Please review our Policy periodically.

**SUMMARY OF PRIVACY POLICY**

We may collect the following personal information when you visit our Site, purchase our Products, or otherwise interact with us:

* Name,
* Billing address,
* Shipping address,
* Email address,
* Telephone number,
* Credit card information,
* Any other personal information you provide to us.

We may use your personal information for the following purposes:

* to provide you with use of our Site to facilitate purchases of our Products;
* to complete transactions and process payment (we engage WIX as our third-party payment processor: <https://www.wix.com/about/privacy>);
* to provide you with support and handle inquiries;
* to improve the quality and functionality of the Site and Products;
* if you choose, to communicate with you about our Products and to provide updates and newsletters;
* to ensure our Site remains functioning and secure;
* to investigate prevent or act on any illegal activities or violations of our Terms of Service; and
* to comply with any applicable law and assist law enforcement agencies as required.

We may share your personal information with the following parties:

* Individuals or organizations who are our advisors, consultants and/or business partners;
* Our payment processor, WIX (<https://www.wix.com/about/privacy>) for the purposes of completing transactions with respect to the Products purchased;
* Our shipping providers, such as Canada Post, FedEx, and/or DHL, for the purposes of facilitating deliveries of our purchased Products;
* Other service providers, including individuals or organizations who are, or may be, involved in maintaining, reviewing and developing our Site and systems, procedures and infrastructure, including testing or upgrading our computer systems.

Under certain exceptional circumstances, Sarabel Enterprises may have a legal duty or right to collect, use or disclose your personal information without your knowledge or consent.

You have the following choices with respect to your personal information:

* Subject to applicable law and certain exceptions, you have the right to request access to and/or correction of your personal information;
* You may contact us to opt out of the use or sharing of your personal information;
* You may sign up for our mailing list in order to receive promotional and other materials that may be of interest to you. If you no longer wish to receive marketing e-mails from us, you may choose to unsubscribe at any time by clicking on the “unsubscribe” link in our emails or by contacting us at [davebelchamber@sarabelenterprises.com](mailto:davebelchamber@sarabelenterprises.com).

For more information on our Policy, our privacy practices, or for any other questions please contact us at [davebelchamber@sarabelenterprises.com](mailto:davebelchamber@sarabelenterprises.com) or at:

Sarabel Enterprises LTD, c/o Dave Belchamber

155 Thare Crescent

Ottawa, Ontario, K2J 2J1

Canada

**FULL VERSION OF PRIVACY POLICY**

**SECTION 1 – WHAT PERSONAL INFORMATION DO WE COLLECT AND HOW DO WE USE IT?**

We may collect the following types of personal information from you:

* **Payment and Transaction Information.** Our Products require payment. When you purchase Products from our Site, as part of the buying and selling process, we collect the personal information you provide to us such as your name, billing address, shipping address, email address, telephone number and credit card information.

We use WIX Payments in order to process your Product purchase transactions. Your personal information is stored on WIX’s data storage databases. We also utilize WIX applications in order to analyze Site activity, feedback, hits, high-level geographic data (i.e. by country), abandoned purchases, and fulfilled purchases, all on an aggregated basis with personal identifiers removed.

For more insight, we recommend you visit and review WIX’s Terms of Service and Privacy Policy.

* **Information that You Provide.** We may occasionally request from you and you may otherwise voluntarily provide us with information that personally identifies you (including, but not limited to, Product purchases, user support, feedback, comments and reviews). Depending on your use of our Site and Products, the personal information we collect may include contact information such as your name, billing address, shipping address, email address, and telephone number. When you send an email or other communications to us, we may retain those communications in order to process your inquiries, respond to your requests and improve the Site and our Products.

Sarabel Enterprises collects personal information for purposes that would be considered reasonable in the circumstances and only such information as is required for the purpose of providing the Site and our Products. We collect your personal information in order:

* to provide you with use of our Site to facilitate purchases of our Products;
* to complete transactions and process payment (we engage WIX as our third-party payment processor: <https://www.wix.com/about/privacy>);
* to provide you with support and handle inquiries;
* to improve the quality and functionality of the Site and Products;
* to ensure our Site remains functioning and secure;
* if you choose, to communicate with you about our Products and to provide updates and newsletters;
* to investigate prevent or act on any illegal activities or violations of our Terms of Service; and
* to comply with any applicable law and assist law enforcement agencies as required.

Our use of personal information is limited to the purposes described in this Policy. We do not otherwise sell, trade, barter, exchange or disclose for consideration any personal information we have obtained.

**SECTION 2 – CONSENT**

**How do you get my consent?**

As required by applicable law, Sarabel Enterprises will obtain your consent before, or when, we collect, use, transfer, and/or disclose your personal information. **By visiting our Site, purchasing our Products, or otherwise interacting with us, you consent to the collection, use, transfer, and disclosure of your personal information by Sarabel Enterprises in accordance with the terms of and for the purposes set out in this Policy, as they may be amended from time to time.** Otherwise, Sarabel Enterprises will obtain your express consent to collect, use, transfer, or disclose your personal information for any new or additional purpose.

**How do I withdraw my consent?**

At any time, subject to contractual and legal restrictions, you may withdraw your consent for us to contact you (if you have previously consented to such communications) or the continued collection, use or disclosure of your information by contacting us at [davebelchamber@sarabelenterprises.com](mailto:davebelchamber@sarabelenterprises.com). It should be noted that in certain circumstances, our Products can only be offered if you provide us with personal information. If you choose not to provide us with the required personal information, we may not be able to offer you our Products. We will inform you of the consequences of the withdrawal of consent, if applicable.

**SECTION 3 – DISCLOSURE**

We may disclose your information to the following parties:

* Individuals or organizations who are our advisors, consultants and/or business partners;
* Our payment processor, WIX (<https://www.wix.com/about/privacy>) for the purposes of completing transactions with respect to the Products purchased;
* Our shipping providers, such as Canada Post, FedEx, and/or DHL, for the purposes of facilitating deliveries of our purchased Products;
* Other service providers, including individuals or organizations who are, or may be, involved in maintaining, reviewing and developing our Site and systems, procedures and infrastructure, including testing or upgrading our computer systems.

Under certain exceptional circumstances, Sarabel Enterprises may have a legal duty or right to collect, use or disclose your personal information without your knowledge or consent. In accordance with applicable laws, we will not disclose your personal information without your consent, except where your information is required to be disclosed: (i) for the purposes of completing a business transaction, such as a sale of our business, merger, amalgamation or similar transaction; (ii) for law enforcement purposes; (iii) for the purpose of complying with a legal requirement; (iv) where information is public as permitted by law; (v) where it is reasonable for the purposes of investigating a breach of an agreement, or actual or suspected illegal activity; or (vi) where it is necessary to permit us to pursue available remedies or limit any damages that we may sustain.

**SECTION 4 – THIRD-PARTY SERVICES**

Note that certain third-party service providers, such as payment gateways and other payment transaction processors, have their own privacy policies in respect to the information required by them for your purchase-related transactions. We recommend that you read their privacy policies so you can understand the manner in which your personal information will be handled by these providers:

* WIX: <https://www.wix.com/about/privacy>.

**SECTION 5 – STORAGE, SECURITY AND CROSS-BORDER TRANSFER**

Information we collect is stored on servers managed by WIX (please review WIX’s Privacy Policy). We also store your personal information locally on our company’s computer hard drive. Standard physical, technical and organizational security procedures and practices appropriate to the nature of the information are implemented in an effort to protect information from unauthorized access, destruction, use, modification, or disclosure.

If you provide your credit card/payment information, the information is encrypted using secure socket layer technology (SSL).  Although no method of transmission over the Internet or electronic storage is 100% secure, WIX follows PCI-DSS requirements and implements additional generally accepted industry standards.

Certain of our third-party service providers may be located in or have facilities that are located in a different jurisdiction than either you or us. If you elect to proceed with a transaction that involves the services of a third-party service provider, then your personal information may be transferred to a country that does not have the same data protection laws as Canada. Your personal information may become subject to the laws of the jurisdiction(s) in which that service provider or its facilities are located, and may be accessible to courts, law enforcement and national security authorities in such jurisdiction. As an example, if you are located in Canada and your transaction is processed by a payment gateway located in the United States, then your personal information used in completing that transaction may be subject to disclosure under United States legislation, including the Patriot Act.

**SECTION 6 – RETENTION**

We keep your personal information only as long as necessary to fulfill the purpose for which it was collected and to meet our legal and contractual obligations. The length of time we retain information varies, depending on the purpose for which it was collected and the nature of the information. This period may extend beyond the end of your relationship with us but it will be only for so long as it is necessary for us to have sufficient information to respond to any issues that may arise at a later date.

We will destroy, erase or make anonymous documents or other records containing personal information as soon as it is reasonable to conclude that the original purpose is no longer being served by retention of the information and retention is no longer necessary for legal or business purposes.

**SECTION 7 – MANAGING YOUR PERSONAL INFORMATION**

* **Access.** Sarabel Enterprises permits the reasonable right of access to your personal information. Upon written request and authentication of identity, we will provide you with access to your personal information under our control, **subject to any legal requirements and applicable exceptions to the right of access**. Where an access request is refused, we will notify you in writing and provide our rationale for refusal along with a list of next steps available to you.
* **Accuracy.** If you demonstrate the inaccuracy or incompleteness of your personal information, we will amend the information as required. If appropriate, we will send the amended information to third-party service providers to whom the information has been disclosed.

Depending on your use of our Site and Products, you may have the following choices:

* **Opt-Outs.** You may contact us to opt out of the use or sharing of your personal information;
* **Marketing E-Mails.** You may sign up for our mailing list in order to receive promotional and other materials that may be of interest to you. If you no longer wish to receive marketing e-mails from us, you may choose to unsubscribe at any time by clicking on the “unsubscribe” link in our emails or by contacting us at [davebelchamber@sarabelenterprises.com](mailto:davebelchamber@sarabelenterprises.com).

**SECTION 8 – LINKS TO OTHER WEBSITES**

We may provide links to, or automatically produce search results for, third-party websites or resources, including links to social media platforms (YouTube and Facebook), or third-party information referencing or linking to third-party websites or resources. Sarabel Enterprises has no control over such third-party websites and resources, and you acknowledge and agree that Sarabel Enterprises is not responsible for the content or information contained therein. When you follow such a link, you are no longer protected by our Policy, and we encourage you to read the privacy statements or other disclaimers of such other parties. Sarabel Enterprises is not responsible for the privacy or security practices or the content of external websites, services or products.

**SECTION 9 – AGE OF CONSENT**

By visiting our Site and purchasing our Products, you represent that you are at least the age of majority in your province of residence, or that you are the age of majority in your province of residence and you have given us your consent to allow any of your minor dependents to use our Site and purchase our Products.

**SECTION 10 – CHANGES TO THIS PRIVACY POLICY**

We reserve the right to modify this Policy at any time, so please review it frequently. Changes and clarifications will take effect immediately upon their posting on the Site. If we make material changes to this policy, we will notify you here that it has been updated, so that you are aware of what information we collect, and under what circumstances, if any, we use and/or disclose it.​

**SECTION 11 – QUESTIONS AND CONTACT INFORMATION**

If you would like to: access, correct, amend or withdraw consent to the use of any personal information we have about you, register a complaint, or simply want more information, contact us at [davebelchamber@sarabelenterprises.com](mailto:davebelchamber@sarabelenterprises.com) or at:

Sarabel Enterprises LTD, c/o Dave Belchamber

155 Thare Crescent

Ottawa, Ontario, K2J 2J1

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Please note that if we are unable to resolve your privacy concerns, you may have the right to complain to the [Office of the Privacy Commissioner of Canada](https://www.priv.gc.ca/en/report-a-concern/file-a-formal-privacy-complaint/) or the appropriate provincial Information and Privacy Commissioner.